IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

JENNIFER ANN GOMAA :

Debtor : CASE NO. 1:14-bk-04469

:

LYCOMING AUTO TRUST, :

Movant

:

v.

JENNIFER ANN GOMAA, : Respondent :

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Proof of default is demanded at trial and this averment is therefore denied, pending Debtor's research of payments made. Movant is adequately protected by equity in the vehicle.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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